

B13
Chet McLaughlin

10/15

Dave Murray, Engineer
Reitz and Jens, St. Louis

He called to request some information and we discussed the status of the GAF and ~~Certain~~-Teed asbestos pile clean up. He is the engineer on the job for GAF. They commenced the grading operations in September after obtaining the approval of the MDNR regional office in St. Louis. Preparing for the placement of the covered drains is the biggest initial project. They should be ready to form this month and hope to have the entire job finished in time to establish seed this fall. If rain doesn't interfere the project should be completed by Thanksgiving. I indicated that I had seen part of the plans for the extensive grading and rerouting of surface water and asked where the top soil would be coming from but he wasn't sure. He will be monitoring the progress and will informally keep me posted.

Note: Call Sanderson

April 28, 1979

To: Robert Morby / Chet McLaughlin
From: Terry Satterlee Watt
Re: GAF Corporation, April 30, 1979,

Chet, I will be out of the office until around noon on Monday. Therefore I have prepoared (Sorry about the spelling) this memo for your use with regard to any press release that is sent out that regards GAF. Someone from my division will call GAF regarding the national release on Monday after it is confirmed as to whether EAF and Certainteed are on the list or not. I am informing Mike Sanderson, [REDACTED] and Martha Steincamp about the situation and would ask that you confirm any press release with ~~me~~ of them.

both

I have attached a copy of the order to this memo. KMOX in St. Louis, Mo., has a copy of this order as does GAF. GAF is aware that KMOX has this order. EPA has order GAF to do 5 separate items with regard to the asbestos waste:

1. cease discharging the toxic pollutant asbestos from outfall 002 and any other source under their authority contributing to the presence of asbestos in Maline Creek.
2. comply with the sample collection procedures and reporting requirements of the NPDES Permit No. MO 0000779.
3. comply with the sample collection and monitoring procedures for records keeping, permit limitations and reporting as required by NPDES Permit No. M) 0000779.
4. Remove asbestos contaminated material from the drainage ditch both upstream and downstream from discharge 002.
5. Isolate asbestos contaminated material present in the waste pile on the facility site.

EPA initially discussed the situation with GAF in December. Subsequently, this order was sent on February 26, 1979. It was received by CITCorp on February 28, 1979, which is the date the 30 days runs from. GAF contacted us within 30 days and has begun on the compliance with the order. They have not actually complied, but they are well on the way. However, in any press statement say only that "GAF has kept us informed as to their progress with regard to compliance with the order, and based on the information they have given to us at this date they are ~~progressing~~ Progressing toward a final solution to the problem." Finally, I know Morby thinks this is a high concentration of asbestos and a substantial hazard. However, I have received various reports as to the seriousness of the problem, including a statement from an expert in headquarters that it isn't sufficient concentration to bother with. So do not, I -repeat do not make any statement as to the "harm" or "hazard" of this site. Just say, EPA sees it as a potential problem. This is very important to the Order and subsequent compliance.

If you have any questions please talk to Martha Steincamp.

As you can tell my typing is limited. Sorry. I'll call you as soon as I get in on Monday.

CC: Tripp

Chief, Mike Sanderson
Compliance EPA - update on
Br, Inf. Div. 6AF - Contained
waste, sub-
combined
effort on
down-up

NAME: GAF Corporation

LOCATION: St. Louis, Missouri

PROBLEM: The GAF Corporation site contains asbestos waste generated from the manufacture of tile. The site located near a stream which enters the Missouri River. GAF tile production is expected to cease in early 1979.

STATUS: Environmental data gathering and monitoring being coordinated by Iowa State Dept. of Health. GAF Corporation was issued a "Findings of Violation and Order for Compliance" pursuant to the Clean Water Act by United States Environmental Protection Agency Region VII on February 27, 1979. They are presently moving toward compliance pursuant to schedule.

LOCATION: Webster County, Iowa

PROBLEM: Inactive. Facility stored waste oil for recycling, road application, etc. 40,000 gallons stored in well maintained tank. Tank is contaminated with PCBs. Court order is restraining disposal of oil so that it can be disposed of properly.

STATUS: State legal action pending against firm.

NAME: Graham Environmental, Inc.

LOCATION: St. Louis, Missouri

PROBLEM: Facility stores 1000 contaminated trichloroethylene. Tank is well maintained; no contamination outside of storage area.

STATUS: EPA and Reg are making a means of disposal. Monitoring is being conducted. EPA is presently disposing of the waste. A series of meetings with all parties is underway to define a course of action.

NAME: GAF Corporation

LOCATION: St. Louis, Missouri

PROBLEM: Air pollution from incinerator and off-site storage. In April, 1979, the site was closed. The incinerator was shut down and the off-site storage was moved. About the same time, the site was closed. The incinerator was shut down and the off-site storage was moved. The site was closed. The incinerator was shut down and the off-site storage was moved.

STATUS: The site is being developed and is expected to be completed by the end of 1979.

Robert Morby

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

file

9E

54
DATE: January 17, 1979

SUBJECT: Asbestos Waste Pile Closing - GAF St. Louis, Missouri

FROM: Steven W. Sisk *Steven W. Sisk*
Hydrologist, Water Section, TECH/SVAN

TO: William W. Rice *WWR*
Director, Surveillance and Analysis Division

THRU: William J. Keffer
Chief, Technical Services Branch, SVAN

On December 13, 1978, five Regional Office employees (including myself) met with five GAF and two MDNR personnel in St. Louis at the company's plant office to discuss plans for closure of the asbestos-product waste pile located on the plant grounds. (See attached attendee list). Mr. Charles Bien was the primary company spokesman and David Tripp had like responsibility for the Agency.

Mr. Tripp began the meeting by stating that:

- 1) Asbestos is not a clearly regulated pollutant, however, we feel that we should be dealing with it as though we had definite authority.
- 2) A face-to-face discussion of problems and solutions for the present dump situation was in order due to recent publicity.
- 3) At the present time no legal actions are underway by EPA against GAF regarding the dump site at this plant.
- 4) (Later) But an Administrative order would be issued ordering the site closure within a reasonable time following submission and review of company plans.

Mr. Bien responded with a history of GAF-asbestos production and the current status which was:

- 1) Product demand is generally drying up because the product is obsolete.
- 2) But, no satisfactory replacement has been found for cooling tower applications.

Next the data collected from my October 13, plant visit was discussed. Neither the company or the state had received the data. We discussed the problems encountered in analyzing samples for asbestos and the company's desire to receive copies of our reports.

The company then indicated that the pile would be closed concurrently with the termination of product manufacture in early 1979. The closure plans were as follows:

- 1) Regrade dump to have approximately 3:1 slope with the top having 4% grade to minimize erosion.
- 2) Cover entire dump area (6-8 acres) with at least 6 inches of "non-asbestos containing" soil cover.
- 3) Then seed the cover with selected grasses.

We agreed that the danger to the environment was from asbestos particulates physically carried by water into surface streams. Groundwater pollution was not given serious consideration since the underlying soils and low percolating water flow velocities were deemed adequate to prevent the downward movement of asbestos. Company studies at another plant seemed to support this conclusion.

I pointed out that the remedial measures did not address the accumulations of waste in the 002 discharge ditch. The company responded by stating that this matter had not been previously considered, but would be addressed in their final plans.

Dave Tripp asked if the company was working on a joint solution with Certain-teed (company with similar production and waste generation to GAF and located on GAF's west property boundary), since their joint waste pile appeared to be one large pile. Mr. Sherman, plant manager, indicated that contacts had been made but that no joint plan was anticipated at this time.

The meeting was concluded with a tour of the dump area and pilot test plots for cover adequacy and relative growth potential.

Just before leaving, we were reminded that the company would like to have a copy of our inspection report and analytical results.

cc: Tripp
Langemeier
Longston

Sanderson
Keffer

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B
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: December 18, 1978

SUBJECT: Report of Meeting with GAF Officials in St. Louis, Missouri,
December 13, 1978, to Plan for Disposal of Asbestos Waste

FROM: Max J. Wilcomb *mw*
Solid Waste Specialist

William L. Brinck *WLB*
Toxic Substances Coordinator

TO: Mr. Robert L. Morby, Chief *RLM*
Hazardous Materials Branch

The following were participants at the 10 a.m. meeting, held at the GAF offices:

Charles F. Bien, Corporate Environmental Engineer, GAF, Wayne, New Jersey
Randy Ford, Plant Engineer, GAF, St. Louis Plant
David E. Murray, Reitz and Jens, Inc., St. Louis, Missouri
Murray S. Sherman, GAF, St. Louis, Missouri
H. J. Holloway, GAF, Environmental Engineer, Wayne, New Jersey
Steven W. Sisk, Hydrologist, EPA, Kansas City, Kansas
William L. Brinck, Toxics Coordinator, Kansas City, Missouri
Ralph Langemeier, Compliance Branch, EPA, Kansas City, Missouri
Dave Tripp, Chief, Legal Branch, EPA, Kansas City, Missouri
Max Wilcomb, Solid Waste Specialist, EPA, Kansas City, Missouri
Steve Swanback, MDNR-SLRO, St. Louis, Missouri
Earl F. Holtgraewe, MDNR-SLRO, St. Louis, Missouri

Murray Sherman has been the Plant Manager for the St. Louis GAF facility for only a few months. Cleaning up the accumulations of asbestos waste and broken stock is one of his priority activities. Charles Bien is Corporate Engineer for Environmental Affairs; he and Mr. Holloway have experience in resolving the company's asbestos waste problems elsewhere in the country. David Murray is a consultant retained by the company to develop the plan for resolving their asbestos waste disposal problem.

Mr. Bien explained that the company would have a study of the problem and a plan of action ready sometime during the first quarter of next year. They intend to comply with MDNR and EPA requirements. The asbestos pile, variously reported as 6 1/2 to 8 acres in area, will be graded to not more than 4 percent slope, covered in excess of 6 inches with 12,000 to 15,000 cubic yards of silt loam soil taken from a bank about a mile away, and seeded. Experimental grass plots are already established on the site.

A better settling system will be built early next year which will reduce waste water flow; the current practice of using the waste pile as a settling and filter basin will be phased out. GAF has been making various asbestos-cement building materials such as flat and corrugated sheathing. There is a current demand for asbestos-cement cooling tower packing material, but the market is about gone for many other products. The company is therefore phasing out much of the asbestos product production and going to the production of polyurethane insulating and structural products.

Mr. Tripp indicated that EPA action will be delayed until receipt of the GAF plans early in 1979. At that time, EPA will consider issuing necessary administrative orders.

A visit was made to the waste pile. Photographs were taken. Copies will be sent to Mr. Sherman and Mr. Holtgraewe.

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3
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: December 11, 1978

SUBJECT: GAF Corporation Asbestos Waste Disposal Site, St. Louis, Missouri

Kenneth S. Ritchey
FROM: Kenneth S. Ritchey
Environmental Scientist

TO: FILE

- o Problem Asbestos runoff and drainage from holding ponds entering tributary of the Mississippi River
 - o KMOX TV Inquiry
 - o SVAN Inspections
- o Meeting to discuss problem
 - o Attendees
 - Robert Morby - Chief, Hazardous Materials Branch
 - Dave Tripp - Chief, Legal Branch
 - Mike Sanderson - Enforcement Division
 - Wolfgang Brandner - Toxics Section
 - Ralph Langemeier - Permits and Compliance Branch
 - Kenneth Ritchey - Waste Management Section
- o Briefing potential health effect of ingesting asbestos - Mr. Brandner
 - o Data nonexistent or insufficient to assess
 - o Priority Pollutants lists
 - o Agency developing WQ criteria
- o Summary of SVAN report (attached)
 - o Site existed since 1927
 - o Asbestos in draft 3001 regulations
 - o In compliance with NESHAPS
 - o GAF evaluating alternatives to correct disposal problem
 - o Certain - Teed has adjacent asbestos waste pile
 - o Recommend joint meeting with GAF, Certain - Teed, state and Region VII personnel

- o Regional approach - Mr. Tripp
 - o Request SVAN site visit at Certain - Teed
 - o Meeting with GAF, Certain - Teed, state and EPA
 - o Enforcement prepare 309 letter to GAF and Certain - Teed
 - o SVAN collect air samples if site not covered - Summer 1979
 - o Instruct SVAN personnel on public health public risks
 - o Waste Management Section feasibility of covering the site
- o Contact with MDNR - Robert Robinson
 - o Status of any state action - none existing
 - o NPDES permit should cover
 - o MDNR had given temporary offsite disposal permit
 - o No onsite disposal permit
 - o No MDNR solid waste personnel have visited the site
 - o EPA inspection GAF and Certain - Teed, state will accompany
 - o Would cover, have to meet state requirements - No answer without site visit
- ~~o Epilogue~~
 - o MDNR on December 7, 1978, informed EPA that GAF plans to cover site within next six weeks

RECORD OF COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☒ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO:

File

FROM:

R. L. Morby

DATE

12-5-78

TIME

1:30 P.M.

SUBJECT

GAF Disposal Site St. Louis, Missouri

SUMMARY OF COMMUNICATION

Michael Sanderson, ENFC visited with me on this date regarding a complaint which had been received on the subject form. Mike said that SVAN personnel had conducted an inspection of the firm this summer and collected several samples. Mike said that SVAN hadn't yet furnished a written report on their findings, but he did get some information over the telephone from Keffner. The analyses were done by the laboratory in Athens, GA. and ~~Cincinnati, Ohio~~ ^{Dayton, Ohio}. The analysis done on a discharge by the Ohio Laboratory showed 2, 111,000,000 fibers per liter; and Athens lab found 3,677,000,000 fibers per liter. The Athens lab also found 4, 359,000,000 fibers per liter on the sediment. These findings were the highest ever recorded by either laboratory. The NPDES permit does not address the discharge of asbestos but Mike believed that permit might be opened to include it.

Mike was interested in what we might be able to do under RCRA. I said that I believed that we would be limited to 7003 but the State of Missouri might be able to reach them under their legislation.

Mike said that GAF had been fairly cooperative in this matter. He had contacted Alton, Ill. about possible disposal of the asbestos, but were concerned about the cost of trucking it to Alton, Ill.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

I held a meeting with Wolfgang Brandner, Scott Ritchey and Morris Tuckman to learn the potential of human health effects at these exposure levels, and the possibility of involving the state of Missouri. A meeting is scheduled for 1:30 P.M. on 12-6-78 to discuss with ENFC ~~these~~ ^{your} findings on these matters.

Robert Mahy 12-6-78

INFORMATION COPIES

TO: CUB, MT, JCW

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

November 22, 1978

Notification of Hazardous Waste Sites

Robert L. Morby, Chief, HAZM

File

I received a telephone call from Mr. Steve Tinkman (314-621-2053) with Channel 4 - St. Louis, Missouri. Mr. Tinkman was interested in the GAF asbestos industrial waste site. He said that he had worked with Mike Sanderson and was somewhat disillusioned that more action had not taken place.

He questioned me about sites in Illinois and I provided three which were among the 103 sites.

ARHM-HAZM:RLMorby:fg:x3307:11-22-78

CONCURRENCES							
SYMBOL	HAZM	ARHM					
SURNAME	RLM	RLM					
DATE	11/27/78	11/27/78					

EPA Form 1320-1 12-78

OFFICIAL FILE COPY

Cony

DATE: October 23, 1978

SUBJECT: Inspection Report

FROM: William W. Rice *W. Rice*
 Director, Surveillance and Analysis Division

TO: W. Lamar Miller, Ph.D.
 Director, Enforcement Division

ATTN: Mr. David R. Tripp
 Chief, Legal Branch, ENFC

Attached is the Inspection Report of GAF Corporation, Building Products Division, St. Louis, Missouri, which was conducted on October 12, 1978.

The source was found to be in indeterminate compliance with respect to NESHAPS Regulations. Some irregularities in data collection were noted with respect to NPDES Regulations.

It is recommended that this facility be reinspected within 90 days for proper determination of compliance with respect to the appropriate NESHAPS Regulations and that Enforcement take appropriate action concerning the NPDES irregularities.

A sample of water collected from the drainage ditch has been sent to the Drinking Water Research Division, Municipal Environmental Research Laboratory, Cincinnati, Ohio.

A supplementary report will be issued when these data become available.

Attachment

13. Certain - tied
Some -
Piles - together
to solve problem

14. No one has
tied to certain
feed
15. New building
600 tons of dirt
to public health

Filtered water

40,000 cu. yds
1200 drops
in holes

- 1. In compliance*
- 2. Uncovered - control - baggage*
- 3. Cover in site - inactive landfill - Cover & establish*
- require NASAP - note*

- 8. Infestation*
- 9. See together, State, GAF, & Head one*
- 10. GAF - do every thing to take remedial*
- 11. Serial photographs being - ?*
- 12. Don't know size of pile?*

- 4. Photo camera in compliance - publicity certainly better*
- 5. Photo studies - 6. do will be taken*
- 7. Enclosure & logbook & monitoring process*

Major Area - further
Area - this